

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

INTERNATIONAL HEALTH BRANDS,  
LLC, a Delaware limited liability company,

Plaintiff,

vs.

ASHLEE R. FOY, an individual;  
MICHAEL L. KAUFMAN, an individual;  
and KCM BRANDS, LLC, a Florida limited  
liability company,

Defendants.

Case No. 9:24-cv-80679

**MOTION TO APPEAR PRO HAC VICE, CONSENT TO DESIGNATION, AND  
REQUEST TO ELECTRONICALLY RECEIVE NOTICES OF  
ELECTRONIC FILING**

In accordance with Local Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Thomas Pasternak (Illinois Attorney ID Number: 6207512) of the law firm of Taft Stettinius & Hollister LLP (111 E. Wacker Drive, Suite 2600, Chicago, Illinois 60601-4208, (312) 836-4134) for purposes of appearance as co-counsel on behalf of Ashlee R. Foy, Michael L. Kaufman, and KCM Brands, LLC, in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Mr. Pasternak to receive electronic filings in this case, and in support of this filing states as follows:

1. Mr. Pasternak is not admitted to practice in the Southern District of Florida and is a member in good standing of the United States District Court For The Northern District Of Illinois. A copy of the Certificate Of Good Standing for Thomas Pasternak from the United States

District Court For The Northern District Of Illinois dated April 16, 2024, is attached hereto as Exhibit "A."

2. Movant, Elizabeth Jimenez, Esq. of the law firm of Raines Legal (2500 N. Military Trail, Suite 303, Boca Raton, FL 33431, (561) 693-2428), is a member of good standing of The Florida Bar and the United States District Court for the Southern District of Florida, and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of the Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Mr. Pasternak has made a payment of this Court's \$200.00 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Mr. Pasternak, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Mr. Pasternak at email address: [TPasternak@taftlaw.com](mailto:TPasternak@taftlaw.com).

WHEREFORE, Elizabeth Jimenez, moves this Court to enter an Order permitting Thomas Pasternak to appear before this Court on behalf of Ashlee R. Foy, Michael L. Kaufman, and KCM Brands, LLC, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Mr. Pasternak.

Dated: August 5, 2024.

RAINES LEGAL  
*Attorneys for Defendant*  
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By: /s/ Elizabeth Jimenez  
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By: /s/ Thomas G. Pasternak  
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**CERTIFICATE OF THOMAS PASTERNAK**

I, Thomas Pasternak, Esquire, pursuant to Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certify that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of the United States District Court for the Northern District of Illinois, Illinois Bar No. 6207512; and (3) I have not filed three or more motions *pro hac vice* admission in this District within the last 356 days.

/s/Thomas Pasternak  
Thomas Pasternak, Esq.